M/s The Ruby Mills Ltd., Ruby House, J K Sawant Marg, Dadar (West), Mumbai-400028 (GSTIN 05190000208ARU as stated in the order)

Authority for Advance Ruling — Uttarakhand

Ruling No. 11/2019-20 dated 12th March 2020, Application No. 06/2019-2… Dated **12.03.2020**

Q Questions Before the Authority

- Whether Fusible Interlining Fabrics of Cotton (in short FIFC) is classified under HSN Code 5903 or under Chapter 52 (heading depending upon the weightage of cotton in the fabrics)?

F Facts

The applicant manufactures fabrics, including micro-dot fusible interlining, from 100% cotton fabric. The cotton fabric undergoes a powder dot coating process in which high density polyethylene powder is printed onto one side of the fabric through an engraved roller and then fixed by heat, and the applicant states the coating is visible to the naked eye. The applicant classifies the product under HSN 5903 and charges GST at 12% on supplies from Maharashtra, while its customers have demanded classification under Chapter 52 at 5%. The order does not state the applicant's exact GST rate for Uttarakhand supplies.

H Ruling

Classification of Fusible Interlining Fabrics of Cotton (FIFC)	**HSN 5903 (Chapter 59), not Chapter 52**	Based on the coating being visible to the naked eye under Chapter 59 Note 2(a)(1). The order does not address the rate of tax.

The Authority held that Fusible Interlining Fabrics of Cotton are **to be classified under HSN Code 5903** of the GST Tariff. The decision rests on the finding that the plastic coating is visible to the naked eye, so the fabric falls within heading 5903 rather than the textile chapters. The order does not state a rate of tax.

R Reasoning

The Authority admitted the application under Section 97(2)(a) as a classification question. It reproduced Chapter 59 Note 2, under which heading 5903 covers textile fabrics coated or covered with plastics, except fabrics whose coating cannot be seen with the naked eye (Note 2(a)(1)). The concerned officer examined the sample and reported that the coating is clearly visible, so he considered Note 2(a)(1) satisfied and saw no need for laboratory testing. The applicant had also admitted the visibility of the coating, so the Authority found the product falls under heading 5903. The applicant's reliance on a 2018 CESTAT decision under central excise and the alternative Chapter 52 position was not discussed in the reasoning.

Prepared as a reading aid. Where this summary and the original order differ, the order governs.

P Provisions Relied On

Section 97(1) and 97(2)(a) of the CGST/SGST Act, 2017

Section 99 and Section 100(1) (appeal to the Appellate Authority within 30 days, as noted in the order)

Chapter 59 of the GST Tariff, Note 2(a)(1), with reference to Note 2(a)(3) and (4)

Heading 5903 and, as cited by the applicant only, Headings 5208 to 5212 of Chapter 52

! For the Practitioner

The ruling helps practitioners whose clients make coated or laminated cotton fabrics, because the visibility of the coating under the naked eye is the test that decides between heading 5903 and the textile chapters. It settles the classification of this FIFC product, whose coating is visible, but it is a ruling for the applicant and is not a general rate determination. It does not decide the rate of tax, does not address fabrics whose coating cannot be seen, and does not engage with the 2018 CESTAT decision that the applicant relied on. Read the full order before relying on it for a different product or a different state.

Source

Summary prepared from the published order, which is a scanned document. It is a reading aid and not the authority: where the two differ, the order governs. Verify every provision against the original before relying on it.

Original order: www.gstcouncil.gov.in -> uk_aar_11_2019-20_12.03.2020_trml.pdf

Prepared 20-11-2026.

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